

Thomas M. Kennedy  
Susan M. Jennik  
KENNEDY, JENNIK & MURRAY, P.C.  
113 University Place, 7<sup>th</sup> Floor  
New York, New York 10003  
Tel: (212) 358-1500  
Attorneys for IUE-CWA

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

-----X	
In re	: Chapter 11
	:
General Motors Corporation, <i>et al.</i>	: Case No. 09-50026 (REG)
	:
Debtors.	: (Jointly Administered)
-----X	

**AMENDED EVIDENCE AND WITNESS LIST FOR THE HEARING TO CONSIDER  
DEBTORS' MOTION PURSUANT TO 11 U.S.C. §§ 105, 363(b), (f), k), AND (m), AND 365  
AND FED. R. BANKR. P. 2002, 6004, AND 6006, TO (I) APPROVE (A) THE SALE  
PURSUANT TO THE MASTER SALE AND PURCHASE AGREEMENT WITH  
VEHICLE ACQUISITION HOLDINGS LLC, A U.S. TREASURY-SPONSORED  
PURCHASER, FREE AND CLEAR OF LIENS, CLAIMS, ENCUMBRANCES, AND  
OTHER INTERESTS; B) THE ASSUMPTION AND ASSIGNMENT OF CERTAIN  
EXECUTORY CONTRACTS AND UNEXPIRED LEASES; AND (C) OTHER RELIEF**

TO THE HONORABLE ROBERT E. GERBER  
UNITED STATES BANKRUPTCY JUDGE

The Objecting Unions: the IUE-CWA, United Steelworkers ("USW") and International  
Union of Operating Engineers ("IUOE"), hereby identify the following individuals as witnesses  
whom the Objecting Unions may call at the June 30, 2009 hearing on the Debtors' Asset Sale  
Motion (Docket No. 92)<sup>1</sup>:

**Witness List**

1. James Clark
2. Debra Turner
3. David Hill
4. Dennis Bingham

<sup>1</sup> The Objecting Unions reserve their rights to amend or supplement this list should the need present itself.

5. Earl R. Williams

6. Joe Patrick

In addition, the Objecting Unions may use the following physical or documentary evidence at the June 30, 2009 hearing on the Debtors' Asset Sale Motion (Docket No. 92)<sup>2</sup>

**Exhibit List**

1. Objection Declaration of James Clark in Support of Objection to Motion to Approve Sale and Exhibits Thereto (Docket No. 1953).

2. Objection Declaration of Debra Turner in Opposition to Motion to Approve Sale Under 11 U.S.C. §363(b) (Docket No. 1956).

3. Declaration of Dennis Bingham and Exhibits Thereto (Docket No. 1948).

4. Objection Declaration of David Hill in Opposition to Motion to Approve Sale Under 11 U.S.C. §363(b) (attached at Tab A).

5. Objection Declaration of Earl R. Williams in Opposition to Motion to Approve Sale Under 11 U.S.C. §363(b) (attached at Tab B).

6. Objection Declaration of Joe Patrick in Opposition to Motion to Approve Sale Under 11 U.S.C. §363(b) (attached at Tab C).

Dated: June 26, 2009  
New York, NY

Respectfully submitted,

KENNEDY, JENNIK & MURRAY, P.C.  
Attorneys for IUE-CWA

By: /s/ Susan M. Jennik

Thomas M. Kennedy  
Susan M. Jennik  
113 University Place, 7th Floor  
New York, New York 10003  
(212) 358-1500

---

<sup>2</sup> The Objecting Unions reserve their rights to amend or supplement this list should the need present itself.